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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

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### Division of Oil, Gas and Mining

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July 22, 2015

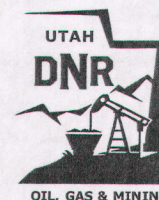
Bureau of Land Management  
Field Manager  
Salt Lake Field Office  
2370 South Decker Lake Boulevard  
West Valley City, Utah 84119

Dear Sir or Madame:

The Division of Oil, Gas and Mining (OGM) is in receipt of your request for comments for the "Conveyance of Public Lands to Utah County for Establishment of a Public Shooting Range". Thank you for giving our agency the opportunity to comment on this project.

OGM is well aware of the issues that indiscriminate target shooting in the Lake Mountains area is causing. There are two mines in the area permitted under the OGM minerals regulatory program. Both are clay mines operated by Interstate Brick Company of Salt Lake City, Utah. The Snow White mine, located in Section 20 of Township 7 South, Range 1 West, is approximately 2.5 miles northwest of the proposed shooting range, and the Smokey Joe mine in Section 9 of Township 7 South Range 1 West is approximately 4 miles north of the proposed shooting range. Both of the permitted mine sites have seen considerable amounts of debris in the form of shell casings, appliances used as shooting targets, and other general trash associated with shooting.

Interstate Brick began reclamation efforts in 2013 at the Smokey Joe mine to regrade and reseed. The operator placed a series of private property signs at the entry points from the main road and also placed large boulders to prevent off-road access into the permit area while reseeding efforts were being evaluated for reclamation purposes. It has been frustrating to both OGM and the operator that these reclamation efforts have been undermined by overuse, trespassing, and litter. At the Snow White mine in Section 20, OGM personnel have noted a considerable amount of trash from shell casings and other debris associated with target shooting. One of the requirements in administrative rule R647-4-107.1.12 is to properly dispose of trash, scrap metal, wood and extraneous debris. This means that OGM can issue a violation to the mine owner for trash on their property that they did not generate but are ultimately responsible for.

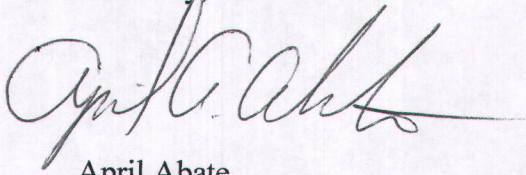




We have reviewed the Environmental Assessment prepared by the BLM. OGM is in support of a shooting range as a way to channel recreational shooting away from the permitted mine sites. This would be a good solution to an ongoing problem. The concern we have is once the shooting range is established, how would the BLM and Utah County continue to measure the effectiveness of the shooting range in mitigating unauthorized shooting in these surrounding areas? The county has produced a Development and Management Plan for the shooting range; however, the plan mostly focuses on the shooting range itself and does not directly consider whether the surrounding area would see benefits and improvements. How will the BLM and Utah County monitor the success of the shooting range in the overall area? Will there be increased patrols by Utah County sheriffs once the shooting range is in place? Will there be stiffer fines and penalties to those who are not using the designated shooting area and/or vandalizing other properties with trash from target shooting? We would respectfully suggest that the BLM and Utah County include these types of commitments in their management plan when drafting an agreement to transfer the land to county control for the shooting range.

Thank you for this opportunity to comment. We wish you the best of luck going forward with this project and hope it will make significant improvements in land use for the Lake Mountains area.

Sincerely,



April Abate  
Environmental Scientist III



Paul B. Baker  
Minerals Program Manager